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Submitted values are:

Your Name: (b) (6)

Your Email: (b) (6) Your Comments:

The Proposed Cleanup Plan for Portland Harbor EPA issued in June 2016 is not rigorous enough. EPA's proposal leaves too much contamination in the harbor, posing a short- and long-term risk to people who fish and swim in the Willamette River, and relies too heavily on fish consumption advisories and river restrictions. A more rigorous alternative such as Alternative G (with offsite disposal) will provide more effective protection to human health and the environment for present and future generations.

Some of my specific concerns are:

- EPA's Proposed Plan depends too heavily on natural recovery. EPA's proposal will leave too much contamination in the river which will wash downstream toward the Columbia River and Pacific Ocean. The solution to pollution IS NOT dilution; it is more thorough removal of the contaminants and proper disposal of the waste in offsite waste disposal sites.
- EPA's Proposed Plan does not include a rigorous monitoring plan, nor alternatives that would be required if the monitoring indicates that the cleanup is not proceeding as planned. EPA must require long-term financial assurance that the monitoring will occur and the public will have access to the monitoring data over at least the next 20-30 years. Further, the cleanup plan must include mid-course corrections so we don't need to waste any further time studying options.
- EPA's Proposed Plan needs to take into account natural disasters such as the Cascadia Earthquake that is predicted in the near future, or flooding such as Portland experienced in 1996.
- EPA must not overly rely on capping (because caps fail) nor on-site disposal (because disposal facilities fail), particularly in the event of a natural disaster.

The Portland Harbor Cleanup Plan must be more rigorous than what EPA has proposed, and well monitored with contingencies in place. Alternative G provides greater risk reduction to protect human health and the environment, and I strongly recommend EPA adopt Alternative G.